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28 KENNETH W. MATTSON

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA – SANTA ROSA DIVISION

In Re:

KENNETH W. MATTSON

Respondent Debtor.

Case No. 24-10714

Chapter 11

**RESPONDENT DEBTOR KENNETH W.  
MATTSON'S MOTION TO DISMISS  
INVOLUNTARY PETITION**

Date: February 5, 2025

Time: 11:00 a.m.

Place: 1300 Clay Street, Courtroom 215  
Oakland, CA 94612

In Person or Telephone/Video  
Conference

Judge: The Honorable Charles Novack

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2 Respondent Debtor Kenneth W. Mattson (hereafter “Mattson”), through its counsel of  
3 record, respectfully moves to dismiss the involuntary petition filed in this Chapter 11 case on the  
4 grounds that 1) the purported obligation associated with the “debt” is the subject of a bona fide  
5 dispute pursuant to 11 U.S.C. § 303(b)(1); or 2) the amount of any alleged “debt” is itself contested  
6 under 11 U.S.C. § 303(b)(1); and 3) this case has become a forum for the ancillary resolution of  
7 disputes between Matson and Petitioner LeFever Mattson, a California Corporation (“LeFever  
8 Mattson”).

9 For these reasons, and as elaborated in the accompanying Memorandum of Points and  
10 Authorities in support of this Motion to Dismiss, dismissal of this involuntary bankruptcy action is  
11 warranted.

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13 Dated: December 20, 2024

FENNEMORE WENDEL

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15 By: /s/ Mark Bostick

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